

## II. REMARKS/ARGUMENTS

These Remarks are in response to the Office Action mailed May 5, 2005. No fee is due for the addition of any new claims.

Claims 1-10 and 12-28 were pending in the Application prior to the outstanding Office Action. The Office Action rejected claims 1-10 and 12-28. The present response cancels claim 7 based on the Examiner's advice, leaving for the Examiner's present consideration claims 1-6, 8-10 and 12-28. Reconsideration of the rejections is respectfully requested.

The Office Action rejected claims 1-4, 8, 12-13, 16-21, 23-25, and 27-28 under 35 U.S.C. § 103(a) as being obvious over Mukhopadhyay et al. ("Passive Capture and Structuring of Lectures," 10/1999, ACM Multimedia '99, pages 1-11; hereinafter, *Mukhopadhyay*); in view of Mitchell et al. (U.S. Patent No. 5,964,966; hereinafter, *Mitchell*). Applicants respectfully traverse these rejections.

The Examiner's obligation in making a *prima facie* case of obviousness requires the Examiner to show that the prior art alone or in combination teaches or suggests all elements of the claimed invention. Applicants respectfully submit that the Office Action has failed to set forth a *prima facie* case of obviousness.

Claim 1 recites a method for linking a scanned document to a video, comprising the steps of: obtaining a scanned document having margins; removing the margins from the scanned document; scaling the scanned document; removing the least significant information from the scanned document; transforming the scanned document into a scanned document identifier; obtaining a video file having a plurality of video frames; transforming the plurality of video frames into a plurality of respective video frame identifiers; comparing the scanned document identifier with the plurality of video frame identifiers; and linking the scanned document to a first video frame in the plurality of video frames. Claim 17 discloses an information system comprising a first processing device; and a persistent storage device, coupled to the processing device, for storing linking software, wherein the linking software removes the least significant information and creates a link between a scanned document file and a segment of a video file responsive to a comparison of a transformed scanned document and a transformed video frame. Claim 21 discloses an article of manufacture, including a computer readable memory, comprising: (a) a first software program for obtaining a scanned document; (b) a second software program for obtaining a video file; and (c) a third software program

for removing the least significant information from the scanned document and linking the scanned document to a segment of the video file.

As the Office Action notes, *Mukhopadhyay* (p.2, right column) teaches that slides are synchronized with the video. *Mukhopadhyay* (p. 3, left column) further teaches an algorithm that matches the slides to the video. Thus, *Mukhopadhyay* teaches a system where a slide region and a video region are running simultaneously on a user interface. These are completely different teachings from that of claim 1, which teaches linking a document to a video through the series of steps listed in the previous paragraph including removing the least significant information from the scanned document. The limitations of linking a scanned document to a video as outlined in claim 1, 17, and 21 are not taught or suggested by *Mukhopadhyay* and *Mitchell*, either alone or in combination. The limitations of removing the least significant information from a scanned document as outlined in claim 1, 17, and 21 are also not taught or suggested by *Mukhopadhyay* and *Mitchell*, either alone or in combination.

As the Office Action further comments, *Mukhopadhyay* (p.10, left column) teaches inserting the digitized output of scan converters when demonstrations are given. Inserting digitized output of scan converters when demonstrations are given does not teach or suggest linking a document to a video through obtaining a scanned document having margins; removing the margins from the scanned document; scaling the scanned document; transforming the scanned document into a scanned document identifier; obtaining a video file having a plurality of video frames; transforming the plurality of video frames into a plurality of respective video frame identifiers; comparing the scanned document identifier with the plurality of video frame identifiers; and linking the scanned document to a first video frame in the plurality of video frames. In fact, *Mukhopadhyay* (p.9, right column) discloses inserting the digitized output of scan converters when demonstrations are given as one of several "avenues" being explored by the authors to improve the quality of the editing decisions. Therefore *Mukhopadhyay* does not teach or suggest linking a document to a video, nor does *Mukhopadhyay* teach or suggest removing the least significant information from the scanned document.

The Office Action characterizes *Mukhopadhyay* (p. 5, see figure 7) as disclosing that "each slide image are set with a value to match with each video frame." *Mukhopadhyay* (p. 5, left and right

columns) discloses scene cut detection algorithms which are used to match a representative video frame from each segment in a set of time values  $T$  with one of the slides in a set of  $n$  slide images  $S$ . *Mukhopadhyay* discloses a system where a slide region and a video region are running simultaneously on a user interface. Applicants, by contrast, disclose linking a document to a *discrete* video through the set of steps listed above. *Mukhopadhyay* thus does not teach or suggest transforming the scanned document into a scanned document identifier.

The Office Action characterizes *Mukhopadhyay* (page 5) as teaching "a video sequence of a plurality of segments." *Mukhopadhyay* (page 5) teaches that slides are synchronized with one of the videos by determining which slide appears in each frame of the video captured by the overview camera. *Mukhopadhyay* (page 5) further teaches a segmentation step in which given a video sequence  $v(t)$ , a set of time values  $T = \{t_0, t_1, \dots, t_k\}$  are computed such that the projected slide image does not change in  $v$  during the interval  $t_i$  to  $t_{i+1}$ . Thus *Mukhopadhyay* teaches a sequence of video *segments*, each segment comprising a plurality of video frames. Applicants, by contrast, teach the step of obtaining a video *file* having a plurality of video frames. *Mukhopadhyay* does not teach or suggest this limitation.

*Mukhopadhyay* (page 5) teaches matching a representative video frame from each segment in a set of time values  $T$  with one of the slides in a set of  $n$  slide images  $S$ . The step taught by *Mukhopadhyay* of *matching* a representative video frame with a *slide* is quite different from the Applicants' claimed step of *transforming* the plurality of video frames into a plurality of respective video frame *identifiers*. *Mukhopadhyay* does not teach or suggest this limitation.

The Office Action characterizes *Mukhopadhyay* (page 5, see figure 7) as teaching "computing a video sequence of  $v(t)$  segments or frames to match against every slide image  $S$ ." *Mukhopadhyay* (page 5) teaches that *given* (not computing) a video sequence  $v(t)$ , we can compute a set of time values  $T$ . *Mukhopadhyay* (page 5, see figure 7) further teaches computing a function  $g$  by matching a representative frame from each segment in  $T$  to one of the slides in  $S$ . It should be noted that *Mukhopadhyay* teaches completely distinct roles and definitions for a video *frame* and a video *segment*. Applicants respectfully note that the conflation, interchangeability, and/or equivalence of video segments and video frames suggested by the Office Action is inconsistent with the teaching of *Mukhopadhyay*.

Regarding independent claims 1, 17 and 21, the Office Action characterizes *Mukhopadhyay* (page 5, see figure 7) as teaching "matching slides in each frame to synchronize video data to the slides." However, the teaching of *Mukhopadhyay* to *match* a representative frame from each segment in T to one of the *slides* in S is quite different from claim 1's limitation of *linking* a scanned *document* to a first video frame in the plurality of video frames. Matching a representative frame to a slide, as *Mukhopadhyay* teaches, can in no way be said to teach or suggest linking a first video frame to a scanned document. Similarly, regarding independent claim 17, the teaching of *Mukhopadhyay* to *match* a representative frame from each segment in T to one of the *slides* in S is quite different from claim 17's limitation of *linking* a scanned *document file* to a segment of a video file. Finally, regarding independent claim 21, the teaching of *Mukhopadhyay* to *match* a representative frame from each segment in T to one of the *slides* in S is quite different from claim 21's limitation of *linking* a scanned *document* to a segment of a video file. *Matching* video data and *slides* involves entirely distinct principles and techniques from *linking* video files or video frames to scanned *documents* or scanned *document files*. *Mukhopadhyay* cannot teach or suggest these limitations of independent claims 1, 17, and 21.

Independent claims 1, 17, and 21 teach removing the least significant information from the scanned document. *Mukhopadhyay* does not teach or suggest removing the least significant information from the scanned document. Regarding independent claim 1, and again regarding independent claims 17 and 21, the Office Action finds that "Mitchell discloses the new amended feature 'removing the least significant information from the scanned document', on col. 8, lines 40-43 teaches since the sample document pages contain large white borders that do not contribute any information, the images were cropped to remove the borders." Applicants respectfully traverse these findings. *Mitchell* (col. 8, lines 36-43) discloses cropping to remove the borders and then rescaling. Claim 1, by contrast, includes the limitation of "removing the least significant information." Claim 17, by another contrast with the suggestion of the Office Action, includes the limitation of "a persistent storage device, coupled to the processing device, for storing linking software, wherein the linking software removes removing the least significant information." Claim 21, by further contrast with the suggestion of the Office Action, includes the limitation of "a third software program for removing the least significant information." Removing the least significant information cannot be

equated with removing borders. Documents including but not limited to such examples as forms, templates, and maps may contain most or all of their significant information near or on the borders. Thus *Mukhopadhyay*, *Mitchell*, and *Kumar*, either alone or in combination, do not teach or suggest these limitations of Claims 1, 17, and 21.

Regarding independent claims 1, 17, and 21, Applicants respectfully traverse the Office Action's suggestion that it would have been obvious to a person of ordinary skill in the art at the time the invention was made to have modified *Mitchell et al.* (U.S. Patent No. 5,963,966; hereinafter, *Mitchell*) into *Mukhopadhyay* to provide a way to scan document pages into images in order to provide a low-cost and high-performance solution for converting paper into a form that can be accessed through the network such as the Internet or a media such as a disk or CD-ROM.

Regarding independent claim 1, *Mitchell* does not teach the limitation of transforming the scanned document into a scanned document identifier. Certainly the direct (or for that matter, indirect) *translation* of a paper document into a hypertext-based or other electronic *format* such as SGML, HTML, and text, is completely different from the limitation in claim 1 of *transforming* a scanned document into a scanned document *identifier* in the course of linking the scanned document to a video. *Mukhopadhyay* and *Mitchell*, alone or in combination, do not teach or suggest this limitation.

With respect to dependent claims 5-6, 9-10, and 22, the Office Action finds that "[i]t would have been obvious to a person of ordinary skill in the art at the time the invention was made to have modified *Kumar* (U.S. Patent No. 5,835,129; hereinafter, *Kumar*) into *Mukhopadhyay* and *Mitchell* to provide the transformation of an image using DCT defined by the orthonormal basis, as taught by *Kumar*, incorporated into the images of *Mukhopadhyay* and *Mitchell*, in order to facilitate the division of image frames into blocks." Applicants respectfully traverse this finding. *Kumar* (col. 8, line 60-col. 9, line 3) discloses "separating the image frame into blocks that are eight pixels wide by eight pixels deep, and then computing the Inverse Discrete Cosine Transform (DCT<sup>-1</sup>) for each block." Thus, as is common in image compression, the orthonormal transform is performed on small blocks of the document. By contrast, claims 5-6, 9-10, and 22 teach orthonormal transforms which are performed at once on the *entire* scanned document. Thus *Mukhopadhyay*, *Mitchell*, and *Kumar*, either alone or in combination, do not teach these limitations of claims 5-6, 9-10, and 22.

Claims 2-6, 8-10 and 12-16 depend from independent claim 1. As such, rejected dependent claims 2-6, 8-10 and 12-16 are patentable for at least the reasons given in connection with claim 1. Claims 18-20 depend from independent claim 17. As such, rejected dependent claims 18-20 are patentable for at least the reasons given in connection with claim 17. Claims 22-28 depend from independent claim 21. As such, rejected dependent claims 22-28 are patentable for at least the reasons given in connection with independent claim 21.

Accordingly, claims 1-6, 8-10 and 12-28 are believed patentable over the cited references and withdrawal of the rejections is respectfully requested.

### III. CONCLUSION

In light of the above, it is respectfully submitted that all remaining claims should be allowable, and a Notice of Allowance is requested. The Examiner is respectfully requested to telephone the undersigned if he can assist in any way in expediting issuance of the patent.

The Commissioner is authorized to charge any underpayment or credit any overpayment to Deposit Account No. 06-1325 for any matter in connection with this response, including any fee for extension of time, which may be required.

Respectfully submitted,

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